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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building

Philadelphia, Pennsylvania 19107-4431

August 29, 1995

Mr. Asuquo Effiong
Department of Environmental Resources
One Ararat Boulevard
Harrisburg, PA 17110

Re: AMP Corporation, Glenrock Facility, Glenrock, PA

Dear Mr. Effiong:

EPA has been contacted by an attorney representing AMP regarding deletion of the above named Site from the National Priorities List ("NPL"). As you may know, although AMP has been listed on the NPL, all remediation at the site has been performed under the RCRA corrective action 3008(h) authorities. Furthermore, EPA recently issued a new policy that allows EPA to delete sites from the National Priorities list when the NPL Site meets the criteria listed in the policy. This new policy titled: "The National Priorities List for Uncontrolled Hazardous Waste Sites; Deletion Policy for Resource Conservation and Recovery Act Facilities" was published on Monday, March 20, 1995 on pages 14641-14645 of the Federal Register. The purpose of this letter is to inform you that EPA is considering AMP's request regarding deletion of the Glenrock Facility and to seek your input.

All remedial work at the Glenrock Facility has been undertaken pursuant to administrative consent orders issued pursuant to RCRA Section 3008(h). AMP has conducted two RCRA Facility Investigations, a Corrective Measures study, and constructed a pump and treatment system for contaminated ground water pursuant to a past administrative order issued by EPA pursuant to Section 3008(h) of RCRA. AMP is currently conducting corrective measure implementation pursuant to a 1991 Administrative Consent Order issued pursuant to Section 3008(h) of RCRA. Pursuant to this current consent order, AMP has submitted a Corrective Measures Implementation ("CMI") report which details the design and construction of the remedy. No action has been performed under CERCLA and none is planned.

This remedial history of the Site is important in determining whether the criteria set forth in EPA's new CERCLA deletion policy can be met. In summary, the criteria for deleting NPL2 sites under this new policy are given below:

1. If evaluated under EPA's current RCRA/NPL deferral policy, the site would be eligible for deferral from listing on the NPL;

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2. The CERCLA site is currently being addressed by RCRA corrective action authorities under an existing enforceable order or permit containing corrective action provisions;
3. Response under RCRA is progressing adequately; and,
4. Deletion would not disrupt an ongoing CERCLA action.

EPA believes that the AMP Site may meet the criteria given in the new CERCLA Deletion Policy. EPA also believes that the RCRA authorities are sufficient to address contamination at the Site. As stated above, AMP is implementing the remedy under a RCRA 3008(h) consent order. EPA would like to know if the PADEP would object to deletion of the Site from the NPL. Although listing the Site on the NPL may have helped facilitate compliance under RCRA, deferral to RCRA may now be appropriate.

Once you have discussed this possibility with your management and counsel, please contact me at (215) 597-0676 so that we can discuss the matter further.

Sincerely,


Frank Vavra, Project Manager
Western PA Section

cc. Jeffrey Pike, CERCLA Western PA, Section Chief
Chris Pilla, RCRA Corrective Action, Section Chief
Kai Shum, RCRA Project Coordinator
Kathleen Root, Esq.

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